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### REMARKS/ARGUMENTS

Claims 1-24 were presented and examined. Claims 1, 2, 6, 10, 11, 15, 19, and 20 were rejected under 35 USC § 102(e), as being anticipated by Bare *et al.* (USPN 6,654,382). Claims 3, 4, 5, 12, 13, 14, 21, and 22 were rejected under 35 USC § 103(a) as being unpatentable over Bare as applied to claims 1, 10, and 19, and further in view of Redlich (USPN 6,591,306). The Examiner rejected claims 8-9, 17-18, and 24 under 35 USC § 103(a) as being unpatentable over Bare as applied to claims 1, 10, and 19, and further in view of Raith (USPN 6,510,515). In this response, Applicant has amended claims 1, 6, 10, and 19 and canceled claims 7, 16, and 23. Claims 1-6, 8-15, 18-22, and 24 remain pending.

#### Claim rejections under 35 USC §§ 102(e), 103(a)

The Examiner rejected claims 1, 2, 6, 10, 11, 15, 19, and 20 were rejected under 35 USC § 102(e), as being anticipated by Bare *et al.* (USPN 6,654,382). In response to this rejection, Applicant has amended each of the independent claims to recite that the claimed invention includes responding to the identification of a device by issuing multiple instances of a network command targeting the identified device. In addition, the independent claims as amended now recite responding to receiving a number of the network commands exceeding a specified threshold by performing a user detectable action on the targeted device. Because these limitations are supported in the specification as originally submitted at the paragraph beginning on page 6, line 26, no new matter is introduced by these amendments.

The cited references do not disclose or suggest the limitations of the independent claims as amended herein. The Examiner acknowledges that Bare fails to disclose or suggest wherein the number of network commands exceeds a predetermined threshold. The Examiner cites col. 19 lines 46-67 and col. 20, line 66 to col. 21, line 30 of Redlich as disclosing a system for providing configuration information to a network device including the step of issuing number of consecutive ping requests and wherein the number of echo requests exceeds a predetermined threshold. Applicant would respectfully disagree with the Examiner's interpretation of Redlich. At col. 19, lines 46-67, Redlich reads as follows:

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At step 2070, the access router 900 enters a wait state. After the wait state expires, processing continues with step 2080. At step 2080, *it is determined whether a predefined router ARP wait threshold has expired*. In the preferred embodiment, the router ARP wait threshold is 30 microseconds. It is sufficient, however, to use any time threshold that is at least twice the maximum delay for the request-reply period for the ARP protocol.

In step 2080, if the router ARP wait threshold has not yet been exceeded, processing continues with step 2050 to see whether or not an ARP reply has been received. In this example, no other station on network 400 sends an ARP reply to the ARP request message from guest station 210. Therefore, the router ARP wait threshold is met or exceeded, and processing continues with step 2090.

In step 2090, the access router 900 sends a proxy-ARP reply back to station 210 in which the proxy-ARP reply indicates the HW address of the access router 900. At step 2100, the access router adds the IP address 138.15.103.52 (i.e., the IP address for router 502) to the ARP addressee table 921 as a non-local station. Processing at step 2110 will be described later on, below. (emphasis added).

It is apparent from this excerpt that Redlich is referring to a time-based threshold whereas the independent claims have been amended to recite a qualitatively different type of threshold, namely, a threshold based on the number of identical instances of a network command.

In addition, although Redlich does refer to action being taken when "the guest does not answer to a certain number of consecutive ping requests, which the access router may periodically issue for each guest station that has been inactive for a predetermined amount of time", it is readily apparent from the text that Redlich is not describing a system in which multiple identical instances of a network command are issued in response to a user specifying a targeted device as is now recited in the amended independent claims. In contrast, the independent claims as amended herein now recite that in response to a single action, namely, identifying a device, multiple identical instances of a network command are issued and that the receiver of these multiple instances of a command is configured to respond by performing a user detectable action when the number exceeds a specified threshold.

Moreover, independent claim 1 as amended explicitly recites that the user detectable action taken by the targeted device enables the user to identify the device. The cited references do not disclose or suggest that the action taken by a targeted device is taken for purposes of

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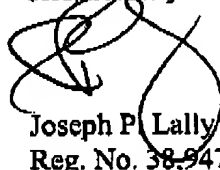
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enabling a user to identify the targeted device. Bare, for example, enables an administrator to assign logical addresses to networked devices. The assignment of logical address to certain physical IP addresses does not enable the administrator to identify the specific system to which the address is being assigned. In contrast, the thrust of the present invention is to enable an administrator or other user to determine which physical box is associated with a particular IP or logical address.

Because the limitations of the independent claims as amended herein are neither taught nor suggested by the cited references, Applicant would respectfully request the Examiner to reconsider and withdraw the prior art rejections of the independent claims and all claims depending therefrom.

In this response, Applicant has addressed the claim rejections under 35 USC § § 102(e), 103(a). Accordingly, Applicant believes that this response constitutes a complete response to the Office Action. In light of the amendments made herein and the accompanying remarks, Applicant believes that the pending claims are in condition for allowance. Accordingly, Applicant would request the Examiner to withdraw the rejections, allow the pending claims, and advance the application to issue. If the Examiner has any questions, comments, or suggestions, the undersigned attorney would welcome and encourage a telephone conference at 512.428.9872.

Respectfully submitted,



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